



SDMS DocID 2075281



Environmental Health and Safety

(360) 650-3064 ☐ Fax (360) 650-6514

Direct: (360) 650-6512 ☐ Cell: (360) 739-0185

Safety Building, Room 111, Mail Stop 9070
Bellingham, WA 98225-9070

August 26, 2005

Mr. Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia PA 19103-2029

**RE: Safety Light Corporation Site
Bloomsburg, Pennsylvania**

Dear Mr. Steinmetz:

Western Washington University (WWU) has prepared the following materials in response to an inquiry to the University's President from Mr. Abraham Ferdas, Director, Hazardous Site Cleanup Division, dated July 21, 2005. WWU responses are provided below the numbered questions, which are reproduced in part for clarity.

1. Describe in detail the business relationship between WWU and Safety Light.

WWU Response. Western Washington University has been unable to find in its archives and records any information about a business relationship between itself and Safety Light. The records provided in Enclosure 4, Ledger Sheet from Safety Light, Inc., to the above-referenced letter dated July 21, 2005 from Mr. Ferdas suggest that Polonium-210 (Po-210) likely was transferred between Safety Light and WWU in 1961, 1963 and 1966.

Because the half-life of Po-210 is approximately 138.39 days, it is highly likely that WWU purchased small amounts of Po-210 from Safety Light for use in teaching. It is very unlikely that WWU sent Po-210 for disposal because the small amounts shown in the attachments could have been stored easily at the University at no expense until the material decayed to below background levels.

2. Did WWU ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite to the Site?

WWU Response. No, WWU believes that it or its agents never transported or brokered hazardous substances and/or radioactive waste or other wastes to the Site. As described above, the Po-210 shown in Enclosure 4 of the July 21, 2005 letter from Mr. Ferdas would have likely been used for teaching. If unwanted, it would have been stored on-site for decay until levels were below background.

3. If you answered "yes" to Question 2, please answer the following questions:

WWU Response. WWU answered "NO" to question 2 and is not answering any part of question 3.

4. **Did WWU ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite at the Site?**

WWU Response. WWU believes that it or its agents never generated radioactive wastes or other wastes that were disposed of or reclaimed at the Site.

5. **If you answered "yes to Question 4, please address the following issues:**

WWU Response. WWU answered "NO" to question 4 and is not answering any part of question 5.

6. **If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses and telephone numbers of such persons as well as additional information or documents they may have.**

WWU Response. WWU does not believe that there are persons able to provide more detailed or complete responses or to provide documents regarding the Safety Light Corporation Site.

7. **For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.**

WWU Response. WWU is not aware of any documents or information available and not in the University's possession that are responsive to this Information Request.

8. **If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.**

WWU Response. WWU is not aware of any information available about other parties who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the site.

9. **If any of the documents solicited in the information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:**

WWU Response. WWU believes that it is likely that in the 1960's WWU generated three purchasing documents related to the receipt of Po-210 in 1961, 1963, and 1966, respectively. The University Archives department was not organized until well after the time period in question. Per current WWU University-wide procedures, purchasing records are only kept for 6 years. There are no records of radioactive materials disposal to the Site or of purchase or transfer of radioactive materials from the Site in the radiation safety officer's archival materials.

a. Your document retention policy.

WWU Response. WWU's current purchasing document retention time is 6 years, as stated above. No University department with responsibility to determine document retention periods existed until more than 6 years after 1966, the latest date of material transfer known per Enclosure 4 of the July 21, 2005 letter from Mr. Ferdas.

WWU's University Records Department (from <http://www.wwu.edu/depts/recmgmt/definition.shtml>)

Definition & Management Policy

University records are public records and may not be destroyed, microfilmed or transferred to the University Archives and Records Center without an official retention period approved by the State Records Committee. The committee is composed of the State Archivist, and representatives of the State Auditor, State Attorney General, and Office of Financial Management.

As defined: "public records" shall include any paper, correspondence, completed form, bound record book, photograph, film, sound recording, map drawing, machine-readable material, compact disc meeting current industry ISO specifications, or other document, regardless of physical form or characteristics and including such copies thereof, that have been made by or received by any agency of the State of Washington in connection with the transaction of public business. (RCW 40.14)

No employee has, by virtue of his/her position, any personal or property right to official records even though he/she may have helped develop or compile them. The unlawful destruction, removal from files, and personal use of official records is prohibited.

In managing such documentation, it is the general policy of the University to:

- Create only the records it needs.
- Retain records according to established Records Retention Schedules.
- Maintain active and inactive records in appropriate storage equipment and locations.
- Preserve records of historical significance.
- Identify and protect vital records.
- Discard records no longer required.

b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction.

WWU Response. WWU's current program for records management includes shredding of documents after the specified retention period by a contractor under the auspices of the University Records Department. It is unknown how the records from the 1960's would have been disposed of.

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U.S. Environmental Protection Agency

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- c. **A description of the type of information that would have been contained in the documents.**

WWU Response. WWU's current program for purchasing would have included the material, amount, company, address, telephone, date, cost, tax, and shipping information. It is unknown how the purchasing records from the 1960's would have been kept.

- d. **The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.**

WWU Response. WWU believes that no information is available regarding who would have been responsible for producing, retaining, or destroying the possible documents in question.

If you have questions regarding this submission by Western Washington University, please contact me at (360) 650-6512 or e-mail gayle.shipley@wwu.edu.

Sincerely,



Gayle Shipley, Director

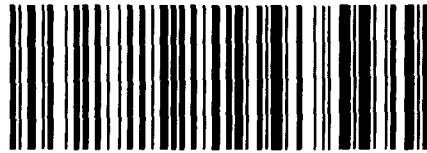
Copy: President Karen W. Morse
Vice President George A. Pierce
Wendy Bohlke
Lisa Wochos



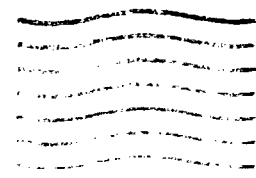
WESTERN

WASHINGTON UNIVERSITY
MS 9070 EHS
516 High Street
Bellingham, Washington 98225

CERTIFIED MAIL



7000 0520 0017 5595 7579



MR. HARRY R. ^{AUG 29 2005}STEINMETZ (3H S62)
U.S. EPA, REGION 3
1650 ARCH STREET
Philadelphia PA 19103-2029

19103+2029

